

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JAMES ST.LOUIS,

PLAINTIFF,

v.

LT. CHERYL MORRIS, et al,

DEFENDANTS.

C.A. 06-236-SLR

JURY TRIAL REQUESTED

PLAINTIFF RESPONSE TO DEFENDANTS OPPOSITION TO COMPEL

The plaintiff does not understand defendant's response to his motion to compel for the following reasons:

- Eileen Kelly is a Deputy Attorney General From the Department of Justice. Plaintiff always thought that the job of the Attorney Generals Office and its attorneys was to see that justice is served. The only way this can be done is for the truth to be found out not to hide behind some law that has to do with disclosure of inmates records or might have a significant influence on security, which this does not.
- Defendant's argument in #2 is 11 Del. C. § 4322 BUT fails to see where in JENKIN v. GULLEDGE Del.Supr. 449 A2d 207(1982) explains the statute as dealing with disclosure of inmates records.
- Also in ONEY v. STATE Del. Supr. 446 A2d 389 it explains that this statute also deals with P.S.R. and prior criminal records of inmates.
- No where does it say that this evidence can not be brought forth . Especially seeing that it does not deal with any safety issues that would put any individuals at risk who are imprisoned or are employed at this prison system.



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- Plaintiff is not asking for any procedures but only seeking the truth that would be brought forth from the states own investigation that could possible show the "mens rea" and "actus rus" that exist in this case
- If nothing else plaintiff was disappointed that the defense counsel did not ask for this information to only be shown to the court system and not given to the plaintiff but that would make one wonder if she really wants to find out the truth.
- This information is evidence and **must** be compelled. For without it the jury would not have all the information available to it to make an intelligent and a fair decision.

September 17, 2007

*James St. Louis*  
JAMES ST.LOUIS  
1181 PADDOCK RD.  
SMYRNA DE. 19977

In the United States District Court  
For the District of Delaware

James St. Louis,  
plaintiff,

CA No 06-236-SLR

Lt. Cheryl Morris, et al,  
defendants.

Jury trial requested

Proof of Service

I, James St. Louis Jr., do swear or declare that  
on this date 9/19/07 I served via United  
States mail the following paperwork:

1. Answer to summary judgment
2. Notice of objection
3. Answer to defendants opposition to compel
4. Answer to defendants responsive protest & gag
5. Notice for admission of facts.

I sent two (2) copies to the following party

State of Del.

Dept of Justice

State Office Bld.

Wilmington De. 19801

I declare under penalty that foregoing is true

executed on 9/19/07

James St. Louis